

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 05-10806-RCL

BOSTON AND MAINE CORPORATION and
SPRINGFIELD TERMINAL RAILWAY
COMPANY,

Plaintiffs

v.

TOWN OF WESTFORD, WESTFORD BOARD
OF HEALTH, DARREN R. MACCAUGHEY,
SANDY COLLINS, R.N., ZAC CATALDO,
TODD LOBO, TOM MAHANNA, JOANNE
MARTEL, JOSEPH GUTHRIE, JR.,
MASSACHUSETTS DEPARTMENT OF
ENVIRONMENTAL PROTECTION and
ROBERT W. GOLLEDGE, JR.,

Defendants

DEFENDANTS', TOWN OF
WESTFORD, WESTFORD BOARD
OF HEALTH, DARREN R.
MACCAUGHEY, SANDY
COLLINS, R.N., ZAC CATALDO,
TODD LOBO, TOM MAHANNA,
JOANNE MARTEL, AND JOSEPH
GUTHRIE, JR., ("DEFENDANTS")
VOLUNTARY DISCLOSURE OF
DISCOVERABLE INFORMATION
PURSUANT TO
FED.R.CIV.P.26(a)(1)

Now come the defendants in the above-captioned matter, pursuant to Fed.R.Civ.P.
26(a)(1) and hereby disclose that the following individuals are likely to have discoverable
information that the defendants may use to support their defenses and that the following
documents are in the possession, custody and control of the defendants and may be used thereby
in support of their defenses:

A. The Name and, if Known, the Address and Telephone Number of
Each Individual Likely to Have Discoverable Information That the
Defendants May Use in Support of Their Defenses

1. Plaintiffs
2. Darren R. MacCaughey
Director of Environmental Services
Town of Westford Board of Health
Town Hall
55 Main Street
Westford, MA

3. Zac Cataldo
Town of Westford Board of Health
Town Hall
55 Main Street
Westford, MA
4. Todd Lobo
Town of Westford Board of Health
Town Hall
55 Main Street
Westford, MA
5. Tom Mahanna
Town of Westford Board of Health
Town Hall
55 Main Street
Westford, MA
6. Joanne Martel
Town of Westford Board of Health
Town Hall
55 Main Street
Westford, MA
7. Joseph Guthrie, Jr.
Town of Westford Board of Health
Town Hall
55 Main Street
Westford, MA
8. Michael Kopko
53 N. Main Street
Westford, MA

B. A Copy of , or a Description by Category and Location of, All Documents, Data Compilations, and Tangible Things That Are in the Possession, Custody or Control of the Defendants Which the Defendants May Use to Support their Defenses.

1. Westford's Board of Health undated Enforcement Letter;
2. Westford's Board of Health Complaint Form dated February 4, 2005.

C. Applicable Insurance Agreements

Metrogard / Diplomax, Public Officials Liability Policy, Policy No. XP31000446

DEFENDANTS TOWN OF WESTFORD,
WESTFORD BOARD OF HEALTH,
DARREN R. MACCAUGHEY, SANDY
COLLINS, R.N., ZAC CATALDO, TODD
LOBO, TOM MAHANNA, JOANNE
MARTEL, JOSEPH GUTHRIE, JR.,

By their attorneys

/s/ Sarah N. Turner
Joseph L. Tehan, Jr. (BBO # 494020)
Sarah N. Turner (BBO# 654195)
Kopelman and Paige, P.C.
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Boston, MA 02116
(617) 556-0007